

**REMARKS**

The Examiner's rejections and comments have been carefully reviewed and the application has been amended in a manner, which taken together with the following remarks, is believed to overcome the formal objections and demonstrate the allowability of this application.

The amendments herewith are made without prejudice, without admission, without surrender of subject matter; and are not intended to give rise to any estoppel as to equivalents.

**Formal Objection to the Drawings**

A replacement sheet for the drawings including Figure 1, now labeled as "Prior Art", has been prepared and is submitted herewith in compliance with the Examiner's requirements set out in numbered paragraph 3 of the current Official Action.

**Formal Objection to the Abstract**

The Abstract has been amended to a more concise wording as required by the Examiner in numbered paragraphs 4 & 5 of the current Official Action.

**Section 103 Claim Rejections:**

Claims 1-10 have been rejected under 35 U.S.C. §103(a) as unpatentable over the combination of at least four separate references (including a stated "state of the art as taught by the applicant description"); namely Gerard, Gore, Kirk-Othmer, and Martin. As many as three of four additional references have been variously applied against the remaining claims 6 to 9.

The Examiner has combined a significant number of references which explain with hindsight the reasons for the effectiveness and scientific basis for the Applicant's invention. It is respectfully submitted that what is lacking from each combination of references is the basis for making such various prior art combinations.

In particular, the applicants have shown in the specification at the bottom of page 4 why the Gerard tank-in-tank prior art would not be practical nor commercially effective for the most common dual coating baths (namely the zinc-based and aluminum-zinc based baths).

The PCT equivalent of Gerard was published over 20 years ago and yet there has been no reference since that teaches nor even suggests the counter-intuitive step of changing the composition of one bath to permit the use of the second (and then changing the composition back again as needed).

The Examiner's secondary references show why the applicants' method works, but they fail to suggest it. The problem has been out there for over twenty years, yet applicants' solution

has never before been taught nor suggested. The cost of using the Gerard teaching, at least for the bath combination claimed here, was at least not effective for the reasons given in the applicants' specification and further is understood not to be even practical for such purpose.

The teaching of Gore, if anything, supports this argument; in that it teaches away from immersing the inner tank 21 in the bath within the outer tank 11. Gerard was not followed by Gore for the reasons already expressed in the first full paragraph of the specification at page 3, with the resultant disadvantages there expressed.

In conclusion, the secondary references of Kirk-Othmer and Martin, as well as the two Japanese references and the two remaining cited U.S. patents all fail to supply the omission of the principal reference combinations, regarding the change in composition in the first tank when switching either to use of the bath in the second tank or back from such use. Thus, there is nothing in any of these references to lead one skilled in the art to the applicants' invention.

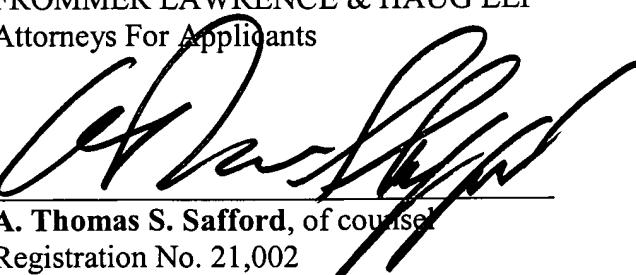
**Conclusion:**

In view of the forgoing, it is believed that all of the issues requiring response have been addressed and properly met; so that this application should now be in condition for allowance. Accordingly, favorable review of the application, reconsideration and withdrawal of the objections to and rejections of the application, and prompt issuance of a Notice of Allowance are earnestly solicited.

If the Examiner has any remaining reservations sufficient still to disallow this case, it is respectfully urged that this be discussed in an interview at least by telephone (or if necessary, by personal interview).

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